

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX

NICOLE WOOTEN,

Plaintiff,

v.

LIMETREE BAY TERMINALS d/b/a
OCEAN POINT TERMINALS, PORT
HAMILTON REFINING AND
TRANSPORTATION, and WEST
INDIES PETROLEUM, LTD.,

Defendants.

Case No. 1:23-CV-00012

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

NOTICE OF DEPOSITION OF CATHERINE ELIZEE

TO:

Glenda L. Lake, Clerk of the Court
District Court of the V.I.

Donnie King
201 East Las Olas Boulevard, Suite 1800
Fort Lauderdale, FL 33301
Reginald E. Janvier, Esq.
201 East Los Olas Boulevard, Suite 1800
Fort Lauderdale, FL 33301
Attorney for Limetree Bay Terminals, LLC d/b/a Ocean Point Terminals

Andrew C. Simpson
2191 Church Street, Suite 5
Christiansted, VI 00820
Attorney for Port Hamilton Refining and Transportation Port Hamilton
Refining and Transportation

Ryan C. Stutzman Esq.
1138 King Street
Suite 100
Christiansted, VI 00820
Attorney for West Indies Petroleum, Ltd.



Wooten, Nicole v. Limetree Bay Terminals, et. al., Case No. 1:23-CV-00012

NOTICE OF DEPOSITION OF FERMIN RODRIQUEZ

Page 2

Susan Nissman-Coursey
Caribbean Scribes, Inc.
1244 Queen Cross Street, Suite 1A
Christiansted, VI 00820

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26, 30 and 32 Plaintiff, by and through undersigned counsel, will take the oral examination of **CATHERINE ELIZEE** on **April 11, 2025 at 9:00 a.m. AST** at **Lee J. Rohn and Associates 1108 King Street Christiansted VI 00820** before any Notary Public commissioned by the Territory of the US Virgin Islands or other person qualified to administer the oath and take deposition.

This deposition is being taken for use as evidence and/or trial purposes and may be continued from day to day until completed. This deposition may be recorded by stenographic, voice, and/or audio/video means. If the deposition officer is attending remotely, the parties agree to the remote administration of the oath.

RESPECTFULLY SUBMITTED
LEE J. ROHN AND ASSOCIATES, LLC
Attorneys for Plaintiff

DATED: March 26, 2025

BY: /s/ Robin P. Seila
Robin P. Seila, Esq.
VI Bar No. R2043
1108 King Street, Suite 3 (mailing)
56 King Street, Third Floor (physical)
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (340) 778-8855
robin@rohnlaw.com

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on March 26, 2025, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

All counsel of record.

/s/Robin P. Seila